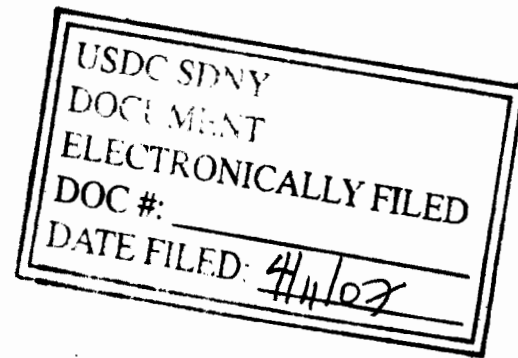


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March 28, 2007

Hon. Kenneth M. Karas  
United States District Judge  
United States District Court  
500 Pearl Street, Room 920  
New York, NY 10007

Re: *Abdell, et al. v. The City of New York, et al.*, 05 CV 8453 (KMK)(JCF)  
*Eastwood, et al. v. The City of New York, et al.*, 05 CV 9483 (KMK)(JCF)  
*Adams, et al. v. The City of New York, et al.*, 05 CV 9484 (KMK)(JCF)  
*Aloisic, et al. v. The City of New York, et al.*, 05 CV 9737 (KMK)(JCF)  
*Araneda, et al. v. The City of New York, et al.*, 05 CV 9738 (KMK)(JCF)  
*Alpert, et al. v. The City of New York, et al.*, 05 CV 9740 (KMK)(JCF)  
*Rigger v. The City of New York, et al.*, 05 CV 9882 (KMK)(JCF)  
*Dolak, et al. v. The City of New York, et al.*, 05 CV 9884 (KMK)(JCF)  
*Kahl and Jakubal v. The City of New York, et al.*, 05 CV 9885 (KMK)(JCF)

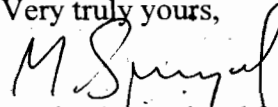
Dear Judge Karas:

I write as counsel in the above-referenced RNC Consolidated Cases to join plaintiffs' objections pursuant to F.R.Civ.P. 72 to Magistrate Judge James C. Francis, IV's March 14, 2007, Order (the "Order") in *MacNamara, et al. v. The City of New York, et al.*, 04 Civ. 9216 (KMK). The Order denied plaintiffs' application to require document production and responses to questions at depositions concerning the role of the NYPD Legal Bureau in arrest processing at Pier 57. In brief, defendants' had asserted the attorney-client privilege to bar production, and as grounds for instructing witnesses not to answer. Plaintiffs' argued that their motion was supported by evidence showing probable cause to believe that the crime-fraud exception to the privilege had been established.

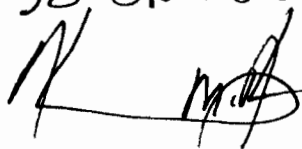
The original motion before Magistrate Judge Francis was in the form of two October 30, 2006, letter briefs submitted jointly by counsel in *MacNamara* and the undersigned, and two reply briefs filed on January 30, 2007, also submitted jointly (see *MacNamara* Memorandum of Law Objecting to the Magistrate Judge's Order, filed March 28, 2007, at p. 6 fn.1).

Therefore, plaintiffs herein join in the *MacNamara* Rule 72 objections, and respectfully request that the undersigned be permitted to participate in any oral argument.

Very truly yours,

  
Michael L. Spiegel [MS0856]

cc: RNC Distribution List (by email)

*So Ordered*  
  
4/4/07